



RECEIVED  
APR 27 1998  
FCC MAIL ROOM

April 24, 1998

Secretary of the FCC  
FCC  
1919 M Street NW  
Washington, D. C. 20554  
202-418-0300  
Reference: RM-9208 & RM-9242

We write on behalf of Citicasters, Co. radio stations KEX, KKRZ, KKCW, KEWS, KOPE, and KLOO AM/FM in the state of Oregon. We strongly oppose proposals under consideration by the FCC that would allow low power FM frequencies.

This concept of low power stations with micro-niche programming for minorities, churches, neighborhoods and community groups is well-intentioned, however, this small step would open the door to more problems than it would solve. Allow us to outline briefly our concerns.

Interference from these low powered stations with existing broadcasts could hinder the public safety. The low-powered, not fully- regulated, broadcasters could hinder public safety due to potential interference with aviation, cellular phones and emergency service providers who rely on the radio airwaves. They will also interfere with existing broadcasters. "Legalized pirate" radio will not serve a broader community, but hinder the community already being served.

Existing broadcasters already tremendously serve the greater public. Radio's strength comes from being a mirror of the community. Conservatively, Portland broadcasters alone contribute more than \$10 million each year to local causes that match their formats and the needs of their listeners. From programming, on-air time, cash contributions, and coordination of major community events to special activities, both large and small. Through all of these efforts, the local community is well served.

of Copies rec'd \_\_\_\_\_  
CODE

A couple of examples of how our stations make a difference in the community: KEX provides diagnosis, eyeglasses and hearing aids to over 1,200 children each year in the public school system who fall through the cracks. During the past ten years the station has raised in excess of one million dollars and provided over 10 thousand children with eyeglasses or hearing aids. KKRZ produces a Christmas CD from which the proceeds provides over 500 needy individuals with the Christmas they could never afford.

These are two out of hundreds of promotions, fundraisers, and events that touch the community each and every day of the year. Some believe the days of consolidation have effected the broadcaster's commitment to the community. This is untrue. It has only effected the name on the license. Our commitment to providing community-related programming and serving the needs of the community has never been stronger.

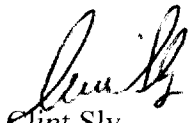
Furthermore, if these proposals are adopted, the resulting impact on broadcasters will include:

Permanent amnesty to hundreds of "pirate operators" who have a proven record of arrogant disregard for technical compliance with FCC rules and operating regulations. Creation of a service which will create thousands of new stations without any realistic ability for the FCC to police or regulate these operations. Creation of a category of stations, fully capable of competing with local broadcasters, but with little or no "public interest" obligations otherwise required of conventional broadcast stations.

A return to the chaos and calamity imposed on the broadcast industry in the 1980's with the adoption of Docket 80-90, when thousands of new signals flooded the spectrum.

We appreciate this opportunity to express our deep concern about the potential danger of this regulation to our community and our members, whom combined, employ hundreds of people in this market.

Sincerely,



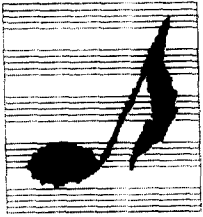
Clint Sly  
Co Market Manager



Ron Saito  
Co Market Manager

cc: Sen. Ron Wyden  
Sen. Gordon Smith

H A R L A N



COMMUNICATIONS

RECEIVED  
APR 27 1998  
FCC MAIL ROOM

DOCKET FILE COPY ORIGINAL

April 24, 1998

Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: RM-9208 and RM-9242

Dear Sirs:

I am writing in firm opposition to the proposals referenced above.

Currently, the commercial radio dial is an orderly spectrum generally free from interference. However, I can cite a couple of instances in our region which have played havoc with area stations, including my FM.

A pirate radio station in the Sacramento area was blocking the signals of several stations over a long period of time in 1997 and played havoc with our fringe coverage. A station co-located on our tower, KSXX-FM, was hit hardest. It took some time to shut that pirate down.

On another occasion, just this winter, a pirate station was interfering with FAA transmissions at Sacramento Executive Airport. It was quickly shut down.

In this day and age, commercial stations are for the most part highly responsible and closely regulated with regard to their power and frequency. Even so, the FCC is stretched beyond its limits to be able to deal with interferences from ham radios, pirate stations and other transmissions which disrupt the orderliness of the spectrum.

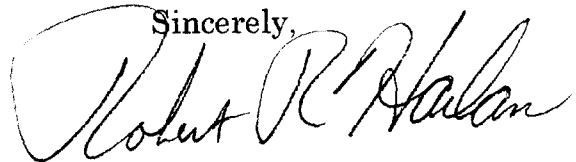
I can see that "neighborhood" type stations, unregulated, could cause major headaches for commercial broadcasters and other "neighborhood" low power broadcasters.

In our market, there is extensive community radio coverage, especially KUBA-AM and KXCL-FM. We are local and for the most part always live. We deal with local issues, local news and support dozens of events from all aspects of the community. We have 30 dedicated employees who place their community first.

We are not alone, as up and down the state we have community-oriented radio station operators in virtually every market.

Please, don't complicate your job and ours. Please vote against RM-9208 and RM-9242.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert R. Harlan". The signature is fluid and cursive, with the first name "Robert" being the most prominent.

Robert R. Harlan  
General Manager

RRH:lh  
cc: Congressman Vic Fazio

DOCKET FILE COPY ORIGINAL

RECEIVED

April 24, 1998

APR 27 1998

FCC MAIL ROOM

Magalie Roman Salas, Secretary  
Federal Communications Commission  
Room 222  
1919 M Street NW  
Washington, DC 20554

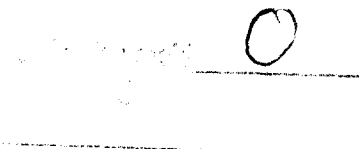
Dear Ms Salas;

Please accept for informal filing the enclosed Comments on the RM - 9208 (a Petition for Microstation Radio Broadcasting Service), RM 9242 (a Proposal for Creation of the Low Power FM Broadcast Service) and RM - 9246 (a Petition to Establish Event Broadcast Stations).

Respectfully Submitted



Mitzi T Gramling  
Associate General Counsel



Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

RECEIVED  
APR 27 1998  
FCC MAIL ROOM

In the matter of:

Request to amend the AM and FM service rules  
to designate one AM and one FM channel for a  
microbroadcast service.

RM - 9208

Proposal for Creation of the Low Power (LPFM)  
Broadcast Service

RM - 9242

Proposal for Event Broadcast Stations

RM - 9246

COMMENTS OF

Minnesota Public Radio  
45 East Seventh Street  
Saint Paul, Minnesota 55101

April 24, 1998

Minnesota Public Radio (MPR) is the nation's leading public radio system with 30 full power stations and 18 translators providing two networks of programming to Minnesota and surrounding regions. MPR serves the entire state with a dual stream of noncommercial broadcasting of classical music and round the clock public news programming. In addition, with national distribution of more than 180 hours of programming weekly, MPR is the largest station-based producer of national programming in the country.

MPR strongly believes that while availability of the airwaves should not be limited only to those with deep pockets, whatever proposals are adopted by the Commission need to assure that good engineering practices are maintained to protect the integrity of existing licensees. For example, any proposal that would weaken or interfere with the Channel 6 protection rules of 47 CFR 73.525, the minimum spacing requirements of the 47 CFR 73.507, the prohibited overlap rules of 47 CFR 73.509, or the translator spacing requirements of 47 CFR 74.1204, would cause disruption and harm to the integrity of the signal of existing licensees. Creating a new class of service that would undermine the integrity of existing classes of services should not be a goal of the Commission.

MPR is experienced in and takes seriously its responsibility to understand and to solve interference problems in many areas of the RF spectrum. In our 32 years of existence, we have successfully dealt with interference problems in the AM, FM, and TV bands, as well as in the microwave and satellite bands. The MPR engineering shop is fully equipped to

make measurements in all of the above bands. In contrast, the petitioners in RM 9208 claim that “(M)any of the technicians in microstation broadcasting will be radio amateurs and other experimenters who will be eager to apply their inventive skills to broadcasting.”

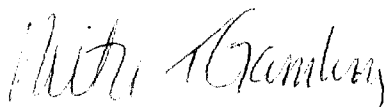
MPR is committed to creating and maintaining the cleanest possible RF sites. To that end, we have corrected television interference caused by our transmitter and have installed cavity filters in both our own and other station’s high power transmitter plants to prevent intermodulation problems.

MPR is also committed to using type-accepted equipment in its facilities, and to following all of the rules of good engineering practice. It is a practice we believe all responsible broadcasters should follow.

It is our belief that following industry accepted practices and maintaining a clean RF operation, besides being a legal requirement and a good engineering practice, also benefits all broadcasters by creating longer transmitter life, and good relations between broadcasters. And a broadcasting framework that protects the integrity of existing station signals and spectrum is a substantial benefit to the American public.

With an already overextended workload, we are concerned that by authorizing the new proposed class of low power license, the Commission will encounter a fair degree of difficulty in insuring broadcasting excellence and fairness to existing licensees. It is therefore belief that if the Commission decides to adopt a Notice of Proposed Rulemaking in response to any or all of the above petitions, the Commission should carefully craft rules that would require low power broadcasters to maintain all of the spacing, good engineering standards and practices required of all other AM and FM licensees, along with an appropriate strict enforcement mechanisms to ensure that the rules are maintained.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Mitzi Gramling".

Mitzi T Gramling  
Associate General Counsel

DOCKET FILE COPY ORIGINAL

**WGAD**  
1350AM

5,000 WATTS

NBC AFFILIATE

1007 LONGWORTH HOUSE  
WASHINGTON, D.C. 20505  
(202) 546-1011  
FAX (202) 546-1011

April 24, 1998

The Honorable Bob Aderholt  
1007 Longworth House Office Bldg.  
Washington, D. C. 20505

Dear Bob:

I will soon be retiring. My advanced age is part of it, but a big part of my getting out of the radio business is due to the flooding of the cities and towns of America with radio stations with Docket 80-90.

The F.C.C. has admitted that this was a serious mistake, and have now allowed entities to buy up all the radio stations they want, but not over 50% of the stations in any one market. They allowed this mass ownership because 50% of all stations were losing money, and these consolidations and automation reduced expenses to the degree that most of the stations could continue to operate in a limited fashion.

Now the F.C.C. is considering requests from Pirate radio stations, under the guise of the First Amendment, to flood the marketplace with new, low-power stations.

Thus, our limited number of businesses who buy advertising on radio will be bombarded with many new vendors looking for ways to finance their operations..to the point that they will resist buying ANY radio, or seeing ANY more solicitors. This has already happened, and, with new, low-powered stations reps calling on them it would be impossible.

Furthermore, as competition gets this intense, none of the stations can offer the service to communities that they have come to expect from broadcasters.

HELP! Please use your influence to persuade the F.C.C. to turn down the "pirate" groups who could destroy the best broadcasting system in the world. References are: FCC File Nos. RM-9208/and RM 9242.

Thanks!

Yours truly,  
*Ed Carrell*

Ed Carrell, Pres. & GM

CC: FCC, Room 222  
1919 M Street, N. W., Washington, D.C. 20554

0

TagYerit  
<http://www.tagyerit.com/>  
rich@tagyerit.com  
tel. 413.256.0248

Wabbit Wecordings  
P.O. Box 0823  
Amherst, Ma 01004-0823

DOCKET FILE COPY ORIGINAL

4/23/98

Office of the Secretary (1800), Room 222, FCC,  
1919 M Street NW, Washington, DC 20554.  
Concerning several petitions for creation of the low power AM & FM  
RM 9208 & RM 9242

I would just like to briefly say that I believe low power radio stations are not only necessitated by commercial stations inability to serve the public interest of only a portion of their audiences, but they are in fact inevitable.

As a musician, I can attest to the proliferation of a variety of recordings released yearly. Estimates for last year are near 30,000. Commercial radio has shown no interest in exploiting the potential of artistic statement. Maybe that's just as well, but there is no logical reason that local stations shouldn't exist to meet the needs of local artists.

There's no reason why communities shouldn't have the ability to discuss their needs on the airwaves, just as they can create local papers. There's no air space for Amherst citizens (my local community) to discuss smoking bans, bar hours, postering, or if a parking garage is what the town needs. This is in spite of the fact we have 2 college stations, one NPR station and many fine commercial stations. The mandate for regional news on WFCR our NPR station reaches a much broader audience, and would have no appeal to these types of issues that concern us here.

How you create it, in terms of technical equipment limitations, and other issues are not my concerns. But I do believe that they should be owned as a public trust, with a local governing board rather than on a "first come" basis. Possibly similar to the way public access television stations exist. The only difference, might be that they could have a commercial value to the community.

Once again I'd like to urge only that you do create a vehicle for low power broadcasting.

Sincerely  
Richard Newman



By the way, I tried to gather info from your website, but found Acrobat to be a slow cumbersome means of gathering information. 2 meg files can take 2 hours to download with a 28.8 modem if you're lucky.

0